

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS

KIMBERLY KJESSLER, KLAIRE  
RUECKERT, LAURA BRALEY, TIMOTHY  
HAYDEN and SUMMER LANG, individually  
and on behalf of all others similarly situated,

*Plaintiffs,*

v.

ZAAPPAAZ, INC., AZIM MAKANOJIYA,  
NETBRANDS MEDIA CORP.,  
MASHNOON AHMED, GENNEX MEDIA,  
LLC, BRANDECO, L.L.C., AKIL KURJI,  
CUSTOM WRISTBANDS INC., and  
CHRISTOPHER ANGELES,

*Defendants.*

Civil Action No. 4:18-cv-0430  
(Consolidated)

**DECLARATION OF KEITH J. VERRIER IN SUPPORT OF  
MOTION FOR AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

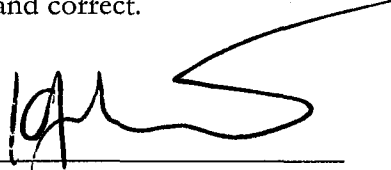
I, Keith J. Verrier, declare as follows:

1. I am a partner at Levin Sedran & Berman LLP. I submit this declaration in support of Plaintiff's motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in the above-captioned action (the "Action").
2. My firm served as Plaintiffs' Counsel in the Action where we represented one of the named plaintiffs and class representative Summer Lang.
3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period of inception of the case through and including today's date. The total number of hours spent by my firm during this period was 304.20, with a corresponding total lodestar (at historical rates) of \$168,503.50. This schedule was prepared from contemporaneous

daily time records prepared and maintained by my firm. In connection with representing the Plaintiffs in the Action, my firm did the following: investigating the underlying factual record and developing the legal theories of the case; drafting the initial complaints; drafting discovery on Defendants; responding to discovery served by Defendants; working with client to collect documents and respond to discovery; and coordinating case strategy and discovery with Plaintiffs' co-counsel. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys and professional staff at or affiliated with my firm for the benefit of the Class. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

4. My firm has expended a total of \$2,746.88 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception of the case through and including today's date. These costs are set forth in the Schedule attached as Exhibit 2 and are reflected in the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

  
\_\_\_\_\_  
Keith J. Verrier  
Partner  
Levin Sedran & Berman

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**EXHIBIT 1 TO THE DECLARATION OF KEITH J. VERRIER IN SUPPORT OF  
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**Reported Hours and Historical Lodestar**  
Inception Through Today's Date

<b>Name</b>	<b>Position</b>	<b>Hours</b>	<b>Historical Rate</b>	<b>Lodestar</b>
Howard J. Sedran	Of Counsel	.50	\$795	\$397.50
Austin B. Cohen	Partner	86.80	\$640	\$55,552.00
Charles E. Schaffer	Partner	5.60	\$640	\$3,584.00
Keith Verrier	Partner	199.60	\$640	\$103,792.00
Nicholas Elia	Associate	8.50	\$500	\$4,250.00
James Rapone	Paralegal	3.20	\$290	\$928.00
<b>TOTAL</b>		<b>304.20</b>		<b>\$168,503.50</b>

**Role Legend**

P Partner  
S Shareholder  
SC Senior Counsel  
OF Of Counsel  
A Associate  
LC Law Clerk  
PL Paralegal  
I Investigator  
SA Staff Attorney  
CA Contract Attorney

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EXHIBIT 2 TO THE DECLARATION OF KEITH J. VERRIER IN SUPPORT OF  
MOTION FOR AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES

Summary Expense Report  
Inception Through Today's Date

Expense	Total Amount
Electronic Research (Lexis/Westlaw/PACER)	\$401.50
Federal Express/Overnight Delivery/Messengers	\$318.20
Postage	\$416.35
Telephone/Fax	\$60.36
Transportation/Meals/Lodging	\$1,545.47
Notary Public	\$5.00
<b>TOTAL EXPENSES</b>	<b>\$2,746.88</b>